



State of Utah

Department of
Environmental Quality

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Site ID: 10874

Title V Operating Permit

PERMIT NUMBER: 4900194002

DATE OF PERMIT: May 24, 2004

Date of Last Revision: May 24, 2004

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Powder River Incorporated
388 East 900 South
Provo, UT 84606

Permitted Location:

Powder River Livestock Handling Equipment
388 East 900 South
Provo, UT 84606

UTM coordinates: 4,452,230 meters Northing, 444,646 meters Easting
SIC code: 3523

ABSTRACT

Powder River Livestock Handling Equipment, Inc. is located in Provo, Utah. The source fabricates and paints livestock handling equipment, such as squeeze chutes, gates, feeders, water troughs, and rodeo equipment. The source is major for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

UTAH AIR QUALITY BOARD

By:

Richard W. Sprott, Executive Secretary

Prepared By:

Brandy Cannon

Operating Permit History

7/23/98 - Permit issued	Action initiated by an initial operating permit application	
10/20/99 -Permit modified	Action initiated by an administrative amendment (initiated by source)	To include conditions from a new Approval Order issued by the Utah Division of Air Quality to Powder River Inc.
5/24/04 - Permit issued	Action initiated by a renewal of an operating permit	

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

Section I: General Provisions

I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C. Duty to Comply.

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. Permit Expiration and Renewal.

I.D.1 This permit is issued for a fixed term of five years and expires on May 24, 2009. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by November 24, 2008. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. Permit Fee.

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H. No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I. Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J. Inspection and Entry.

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K. **Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L. **Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **April 3, 2005** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision

I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

I.L.1.d. Such other facts as the Executive Secretary may require to determine the compliance status.

I.L.2. The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice
(Mail code 8ENF)
EPA, Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

I.M. Permit Shield.

I.M.1. Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:

I.M.1.a. Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))

I.M.1.b. Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

I.M.2. Nothing in this permit shall alter or affect any of the following:

I.M.2.a. The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))

I.M.2.b. The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))

I.M.2.c. The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d. The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N. Emergency Provision.

I.N.1. An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-

based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

I.O. Operational Flexibility.

Operational flexibility is governed by R307-415-7d(1).

I.P. Off-permit Changes.

Off-permit changes are governed by R307-415-7d(2).

I.Q. Administrative Permit Amendments.

Administrative permit amendments are governed by R307-415-7e.

I.R. Permit Modifications.

Permit modifications are governed by R307-415-7f.

I.S. Records and Reporting.

I.S.1 Records.

- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample,

measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.
- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.
- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000

- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and
Environmental Justice (mail code 8ENF)
999 18th Street, Suite 300
Denver, CO 80202-2466

For reports, notifications, or other correspondence
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance
Air & Radiation Program (mail code 8P-AR)
999 18th Street, Suite 300
Denver, CO 80202-2466
Phone: 303-312-6440

I.T. Reopening for Cause.

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:

- I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))
- I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))
- I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))
- I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))
- I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. Inventory Requirements.

Emission inventories shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

II.A.1 Paint Spray Booth (designated as Unit #1)

Unit Description: Enclosed spray booth equipped with dry air filters.

II.A.2 Paint Dipping Operation (designated as Unit #2)

Unit Description: 7,000 gallon dipping tank, Natural Gas fired forced air dry system, airless spray guns for touch-up painting, exhaust fans to outside of building, Pre-1969

II.A.3 Powder Coating Line (designated as Unit #3)

Unit Description: 3 natural gas boilers rated between 0.8 and 1.5 MMBtu/hr, 3 natural gas ovens rated at 0.8, 1.6 and 2.4 MMBtu/hr, and 3 inside vented dust collectors. No unit-specific applicable requirements.

II.A.4 Welding Area (designated as Unit #4)

Unit Description: Welding equipment, vented to outside with fans and roof vents. Pre-1969

II.A.5 Parts Cleaner (designated as Unit #6)

Unit Description: 20-gallon parts washer. No unit-specific applicable requirements.

II.A.6 Soaker Tanks (designated as Unit #7)

Unit Description: 2 tanks, approx. 165 gal each with lids, Pre-1969

II.A.7 Misc. Tanks (designated as Unit #8)

Unit Description: Two 500-gallon fuel tanks. No unit-specific applicable requirements.

II.B. Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 Conditions on permitted source (Source-wide)

II.B.1.a Condition:

Natural gas consumption shall be no greater than 63,200,000 cubic feet per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-0541-98]

II.B.1.a.1 Monitoring:

Compliance shall be determined on a rolling 12-month total. Within the first 20 days of each month, a new 12-month total shall be calculated using the previous 12-months records. Records shall be kept for all periods when the source is in operation.

II.B.1.a.2 Recordkeeping:

Records such as gas bills, gas meter readings and calculations, used to determine compliance with the natural gas consumption limit shall be maintained as described in Provision I.S of this permit.

II.B.1.a.3 Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2 **Conditions on Paint Spray Booth (Unit #1)**

II.B.2.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-0541-98]

II.B.2.a.1 **Monitoring:**

In lieu of monitoring via visible emissions observations, the paint booth particulate capture system shall be inspected to demonstrate that it is functioning properly. Inspections shall consist of the following observations made at the specified frequencies:

1. Monthly inspection for holes in the particulate filters.
2. Monthly inspection of the particulate filters to determine proper installation within the support rack.
3. Monthly inspection of the exhaust fan to ensure that it is operating properly.

II.B.2.a.2 **Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.b **Condition:**

VOC emissions shall be no greater than 0.86 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-0541-98]

II.B.2.b.1 **Monitoring:**

Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 7 days after the end of each calendar month.

II.B.2.b.2 **Recordkeeping:**

VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The records shall include the following data for each material used:

- (a) Name of the VOC emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- (b) Density of each material used (pounds per gallon).
- (c) Percent by weight of VOC in each material used.
- (d) Gallons of each VOC emitting material used each month.

- (e) The amount of VOC emitted monthly by each material used, calculated by the following procedure:

$$\text{VOC} = \frac{(\% \text{ VOC by Weight})}{(100)} \times \frac{[\text{Density (lb)}]}{(\text{gal})} \times (\text{gal Consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$

- (f) The total amount of VOC emitted monthly from all materials used.
- (g) The amount of VOCs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total VOC emissions.

II.B.2.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.c

Condition:

HAP emissions shall be no greater than 0.47 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-0541-98]

II.B.2.c.1

Monitoring:

Compliance with the limitation shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 7 days after the end of each calendar month.

II.B.2.c.2

Recordkeeping:

HAP emissions shall be determined by maintaining a record of HAP emitting materials used each month. The records shall include the following data for each material used:

- (a) Name of the HAP emitting material, such as; paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- (b) Density of each material used (pounds per gallon).
- (c) Percent by weight of HAP in each material used.
- (d) Gallons of each HAP emitting material used each month.
- (e) The amount of HAP emitted monthly by each material used, calculated by the following procedure:

$$\text{HAP} = \frac{(\% \text{ HAP by Weight})}{(100)} \times \frac{[\text{Density (lb)}]}{(\text{gal})} \times (\text{gal Consumed}) \times \frac{(1 \text{ ton})}{(2,000 \text{ lb})}$$

- (f) The total amount of HAP emitted monthly from all materials used.

- (g) The amount of HAPs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total HAP emissions.

II.B.2.c.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.d

Condition:

The paint spray booths shall be equipped with paint arrestor particulate filters. All air exiting the booths shall pass through the filters before being vented to the atmosphere. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-0541-98]

II.B.2.d.1

Monitoring:

Visual inspections of paint booth filter type, installation, and condition shall be made weekly by a shift supervisor to determine compliance with this permit condition.

II.B.2.d.2

Recordkeeping:

A log shall be kept on the results of visual inspections of the paint booth filters. Filters that are damaged, clogged, improperly installed, incorrect filters installed or any other circumstance that limits filter effectiveness shall be documented.

II.B.2.d.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C. **Emissions Trading.**

(R307-415-6a(10))

Not applicable to this source.

II.D. **Alternative Operating Scenarios.**

(R307-415-6a(9))

Not applicable to this source.

Section III: PERMIT SHIELD

A permit shield was not granted for any specific requirements.

Section IV: ACID RAIN PROVISIONS.

This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-0541-98 dated August 26, 1998

1. Comment on an item originating in DAQE-0541-98 regarding permitted source (Source-wide)

O& M condition being dropped: The O & M condition is not being carried over to the Operating permit because it only applies to the paint booth which already has a condition to properly operate and maintain it. [Comment last updated on 10/13/1999]

2. Comment on an item originating in DAQE-0541-98 regarding Paint Spray Booth (Unit #1)

Particulate filter monitoring frequency: This is a fully enclosed horizontal draft paint booth. The exhaust vent that pulls the air out of the booth is located approximately 15 ft high and is unlikely to be damaged by normal day-to-day painting operations. This booth is used exclusively for touch-up painting after the parts have been dipped in the dip tank. The filters are in frames when they are purchased and are almost impossible to install incorrectly. Monthly inspection for holes and proper fit are considered reasonable. [Comment last updated on 10/13/1999]

3. Comment on an item originating in DAQE-0541-98 regarding permitted source (Source-wide)

Changes to Renewal Permit:

- Powder River has eliminated the paint stripper tank per Appendix F of their Renewal Application. Therefore, the paint stripper tank has been removed from the list of emission units in Section II.A.
- Condition #6 of DAQE-541-98 lists a cure oven rated 2.4 MMBtu/hr that was not included in the emission unit list of the previous Title V Permit. The oven has been added to the Powder Coating Line emission unit, Section II.A.3.
- The SIC code has been changed from 5154 to 3523 to more accurately describe Powder River's farm equipment manufacturing business. [Comment last updated on 3/22/2004]

4. Comment on an item originating in DAQE-0541-98, Condition #12 regarding Paint Spray Booth (Unit 1)

Clarification of VOC Limit: The VOC emission limit of 0.86 tons per rolling 12-month period in Section II.B.2.b includes HAP and non-HAP VOCs as stated in the Approval Order. [Comment last updated on 3/22/2004]